

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DONNY RATLIFF, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

PASON SYSTEMS USA CORP.,

Defendant.

Case No. 4:15-CV-02376

JURY DEMANDED

FLSA COLLECTIVE ACTION
29 U.S.C. § 216(b)

JOINT PROPOSED “NOTICE” AND “CONSENT TO JOIN” FORMS

Pursuant to the Court’s June 23, 2016 order granting conditional certification, the Parties submit the proposed Notice, Reminder, and Consent Form to be distributed to the Putative Class Members and a Proposed Order detailing the agreed notice methods and timeline.

Respectfully submitted,

By: /s/ Andrew W. Dunlap

Michael A. Josephson

Fed. Id. 27157

State Bar No. 24014780

Andrew W. Dunlap

Fed Id. 1093163

State Bar No. 24078444

Lindsay R. Itkin

Fed Id. 1458866

State Bar No. 24068647

FIBICH, LEEBRON, COPELAND,

BRIGGS & JOSEPHSON

1150 Bissonnet

Houston, Texas 77005

713-751-0025 – Telephone

713-751-0030 – Facsimile

mjosephson@fibichlaw.com

adunlap@fibichlaw.com

litkin@fibichlaw.com

AND

By: /s/ Donald L. Samuels

Donald L. Samuels

Texas State Bar #24005826

BRYAN CAVE LLP

1700 Lincoln St., Ste. 4100

Denver, CO 80203

Telephone: (303) 861-7000

Facsimile: (303) 866-0200

Donald.samuels@bryancave.com

AND

MITCHELL S. ALLEN

Texas Bar No. 01046800

Texas S.D. No. 2658932

BRYAN CAVE LLP

One Atlantic Center

1201 West Peachtree Street, NW

Suite 1400

Atlanta, Georgia 30309

Telephone: (404) 572-6600

Facsimile: (404) 572-6999

Mitchell.allen@bryancave.com

ATTORNEYS IN CHARGE FOR DEFENDANT

Richard J. (Rex) Burch
Texas Bar No. 24001807
BRUCKNER BURCH PLLC
8 Greenway Plaza, Suite 1500
Houston, Texas 77046
713-877-8788 – Telephone
713-877-8065 – Facsimile
rburch@brucknerburch.com

**ATTORNEYS IN CHARGE
FOR PLAINTIFF**

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served by ECF electronic filing on all known parties on this June 29, 2016.

/s/ Andrew W. Dunlap
Andrew W. Dunlap